

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY  
AVERAGE WHOLESAL PRICE  
LITIGATION

MDL NO. 1456  
Master File No.: 01-CV-12257-PBS  
Judge. Patti B. Saris

THIS DOCUMENT RELATES TO:

*United States of America ex rel Linette Sun  
and Greg Hamilton, et al., Relators, v.  
Baxter Hemoglobin Therapeutics, et al.,  
Defendants.*  
Civil Case No.: 1:08-CV-11200-PBS

**REQUEST FOR ADMISSION OF POOJA RAJARAM *PRO HAC VICE***

Undersigned counsel requests that Pooja Rajaram be permitted to appear and participate in this action *pro hac vice* as counsel of record on behalf of the relators, Linnette Sun and Greg Hamilton, pursuant to this Court’s Case Management Order No. 1, Section V., Paragraph 16, which states:

Each attorney not a member of the Bar of this Court who is acting as counsel for a Plaintiff or Defendant herein and who is in good standing in any district court of the United States shall be deemed admitted *pro hac vice* to practice before this Court in connection with this action upon payment of the appropriate filing fee.

Pursuant to Case Management Order No. 1, attached hereto as Exhibit “A” is the Declaration of Pooja Rajaram in Support of Application for Admission certifying that she has met the requirements to practice before the United States District Court for the District of Massachusetts.

A fees in the amount of \$50.00 are being tendered simultaneously with this motion for Ms. Rajaram’s admission *pro hac vice*.

Respectfully submitted,

LAW OFFICE OF MARK ALLEN KLEIMAN

Dated: July 11, 2011

By: /s/ Mark Allen Kleiman

Mark Allen Kleiman  
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Attorney for Relators  
Linette Sun and Greg Hamilton

# EXHIBIT “A”

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**DECLARATION OF POOJA RAJARAM IN SUPPORT OF APPLICATION**  
**FOR ADMISSION *PRO HAC VICE***

Pooja Rajaram, counsel with the firm Law Office of Mark Allen Kleiman, 2907 Stanford Avenue, Venice, CA 90292, hereby declares:

1. I am a member of good standing of the bar of the State of California.
2. I have been admitted to practice in the United States District Court for the Central District of California.
3. I am a member in good standing in the court listed above.
4. I have not been suspended or disbarred in any court and have never been the subject of a professional disciplinary proceeding.

5. I am familiar with the Local Rules for the United States District Court for the District of Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

LAW OFFICE OF MARK ALLEN KLEIMAN

Dated: July 11, 2011

By: /s/ Pooja Rajaram  
POOJA RAJARAM  
(CA SBN 241777)  
2907 Stanford Avenue  
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310-306-8094  
310-306-8491 (fax)  
prajaram@quitam.org

Attorney for Relators Linette Sun and Greg  
Hamilton

**CERTIFICATION OF SERVICE**

I certify that on July 11, 2011, a true and correct copy of the foregoing **REQUEST FOR ADMISSION OF PROOJA RAJARAM *PRO HAC VICE* AND DECLARATION OF POOJA RAJARAM IN SUPPORT OF APPLICATION FOR ADMISSION *PRO HAC VICE*** filed through the ECF system were served on all counsel of record by electronic service.

/s/ Mark Allen Kleiman  
MARK ALLEN KLEIMAN